Thomas A. Egan, Esq. FLEMMING ZULACK WILLIAMSON ZAUDERER LLP One Liberty Plaza

New York, New York 10006-1404

Telephone: (212) 412-9500 Facsimile: (212) 964-9200 E-mail: tegan@fzwz.com

David W. Steuber, Esq. (pro hac vice application pending)
Tyrone R. Childress, Esq. (pro hac vice application pending)
Donald R. Erlandson, Esq. (pro hac vice application pending)

HOWREY LLP

550 South Hope Street, Suite 1100

Los Angeles, California 90071

Telephone: (213) 892-1800

Facsimile: (213) 892-2300 E-mail: steuberd@howrey.com E-mail: childresst@howrey.com E-mail: erlandsond@howrey.com

Attorneys for Respondent 7 World Trade Company, L.P. (sued in its own name and incorrectly sued under the name of the nonexistent "7 World Trade Center, L.P.")

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

INDUSTRIAL RISK INSURERS,

: 10 CIV 3036 (AKH)

Petitioner,

--against--

MOTION TO ADMIT COUNSEL PRO HAC VICE

7 WORLD TRADE CENTER, L.P., 7 WORLDTRADE COMPANY, L.P.

Respondents.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Thomas A. Egan, Esq., a member in good standing of the Bar of this Court and an attorney with the firm of Flemming Zulack Williamson Zauderer LLP, counsel for Respondent herein, hereby moves for an Order allowing the admission *pro hac vice* of:

Tyrone R. Childress, Esq. Howrey LLP 550 South Hope Street, Suite 1100 Los Angeles, CA 90071 Telephone (213) 892-1800 Facsimile: (213) 892-2300

E-mail: childresst@howrev.com

Tyrone R. Childress is a member in good standing of the Bar of the State of California and is also admitted to practice before the United States Courts of Appeals for the Second and Ninth Circuits, and the United States District Court for the Central District of California.

There are no pending disciplinary proceedings against Tyrone R. Childress in any State or Federal court.

Dated: New York, New York January 11, 2011

Respectfully submitted,

Thomas A. Egan, Esq.

FLEMMING ZULACK WILLIAMSON ZAUDERER LLP

One Liberty Plaza, 35th Floor

New York, New York 10006-1404

Telephone: (212) 412-9500 Facsimile: (212) 964-9200 E-mail: tegan@fzwz.com

Thomas A. Egan, Esq. FLEMMING ZULACK WILLIAMSON ZAUR One Liberty Plaza New York, New York 10006-1404 Telephone: (212) 412-9500 Facsimile: (212) 964-9200 E-mail: tegan@fzwz.com David W. Steuber, Esq. (pro hac vice application Tyrone R. Childress, Esq. (pro hac vice application Donald R. Erlandson, Esq. (pro hac vice application HOWREY LLP 550 South Hope Street, Suite 1100 Los Angeles, California 90071 Telephone: (213) 892-1800 Facsimile: (213) 892-2300 E-mail: steuberd@howrey.com E-mail: childresst@howrey.com	on pending) tion pending)
E-mail: erlandsond@howrey.com Attorneys for Respondent 7 World Trade Comp (sued in its own name and incorrectly sued under the nonexistent "7 World Trade Center, L.P.") UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	er the name of
INDUSTRIAL RISK INSURERS, Petitioner,	X : : 10 CIV 3036 (AKH) :
against 7 WORLD TRADE CENTER, L.P., 7 WORLDTRADE COMPANY, L.P. Respondents.	: AFFIDAVIT OF THOMAS : A. EGAN IN SUPPORT : OF MOTION TO ADMIT : COUNSEL PRO HAC VICE
STATE OF NEW YORK)) ss.: COUNTY OF NEW YORK)	X

THOMAS A. EGAN, ESQ., being duly sworn, hereby deposes and says as follows:

- 1. I am Of Counsel to the firm of Flemming Zulack Williamson Zauderer LLP, counsel for Respondent 7 World Trade Company, L.P. ("Respondent") in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Respondent's motion to admit Tyrone R. Childress as counsel *pro hac vice* to represent Respondent in this matter.
- 2. I am a member in good standing of the Bar of the State of New York, and was admitted to practice law in 1985. I am also admitted to the Bar of the United States District Court for the Southern District of New York and am in good standing with this Court.
- 3. Mr. Childress is a Partner at Howrey LLP, in Los Angeles, California. Mr. Childress is a member in good standing of the Bar of the State of California. A Certificate of Good Standing issued by the Supreme Court of the State of California with regard to Mr. Childress is attached hereto as Exhibit A.
- 4. Mr. Childress is a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Procedure.
- 5. Accordingly, I am pleased to move the admission of Tyrone R. Childress, *pro hac vice*.
- 6. I respectfully submit a proposed order granting the admission of Tyrone R. Childress, *pro hac vice*, which is attached hereto as Exhibit B.

Case 1:10-cv-03036-AKH Document 25 Filed 01/11/11 Page 5 of 8

WHEREFORE it is respectfully requested that the motion to admit Tyrone R. Childress, pro hac vice, to represent Respondents in the above-captioned matter, be granted.

THOMAS A. EGAN

Sworn to before me this 11th day of January, 2011

Notary Public

SEVERLY R. NACHIMSON Notary Public, State of New York No. 01NA6153052

Qualified in New York County

A remaining Expires September 25, 204



Supreme Court of California

FREDERICK K. OHLRICH

Clerk of the Court

CERTIFICATE OF THE CLERK OF THE SUPREME COURT OF THE

STATE OF CALIFORNIA

Tyrone Richard Childress

I, FREDERICK K. OHLRICH, Clerk of the Supreme Court of the State of California, do hereby certify that Tyrone Richard Childress was on the 7th day of December, 1988 duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.

Witness my hand and the seal of the court on the 20th day of December, 2010

FREDERICK K. OHLRICH

Clerk of the Supreme Court

Denuty Clerk

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	***
INDUSTRIAL RISK INSURERS,	: 10 CIV 3036 (AKH)
Petitioner,	:
against	: ORDER FOR ADMISSION : <i>PRO HAC VICE</i> ON
7 WORLD TRADE CENTER, L.P., 7 WORLDTRADE COMPANY, L.P.	: WRITTEN MOTION
Respondents.	· : :
	X

Upon the motion of Thomas A. Egan, Esq., attorney for Respondent 7 World Trade Company, L.P. (sued in its own name and incorrectly sued under the name of the nonexistent "7 World Trade Center, L.P.") and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Tyrone R. Childress, Esq. HOWREY LLP 550 South Hope Street, Suite 1100 Los Angeles, California 90071 Telephone: (213) 892-1800

Facsimile: (213) 892-2300 Email: childresst@howrey.com

is admitted to practice *pro hac vice* as counsel for 7 World Trade Company, L.P. in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys.

Dated: New York, New York January ___, 2011

United States District Judge	

CERTIFICATE OF SERVICE

THOMAS A. EGAN, ESQ., an attorney admitted to the Bar of this Court, hereby

certifies that, on January 11, 2011, I caused the within Motion to Admit Counsel Pro Hac Vice

to be served on Mary Kay Vysokocil, Esq., counsel for Petitioner, by having a true copy of same

placed in an envelope bearing appropriate first-class postage and addressed to Ms. Vyskocil at

her office, Simpson Thacther & Bartlett LLP, 425 Lexington Avenue, New York, New York

10017, and delivered to a receptacle in the exclusive care and custody of the Untied States Postal

Service. An electronic courtesy copy of same was also delivered to Ms. Vyskocil via e-mail

directed to her e-mail address [mvyskocil@stblaw.com].

Dated: January 11, 2011

New York, New York

THOMAS A. EGAN